

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT A. STROMSTED,

Plaintiff,

vs.

HNTB CORPORATION,

Defendant.

: AFFIDAVIT OF PAUL YAROSSI IN
: SUPPORT OF DEFENDANT'S
: MEMORANDUM IN OPPOSITION
: TO PLAINTIFF'S MOTION FOR A
: PRELIMINARY INJUNCTION

:
: Case No.: 11-cv-02023-AKH

:
: ECF CASE
:
:----- X

STATE OF Massachusetts)
) SS:
COUNTY OF Middlesex)

Paul Yarossi, being duly sworn, deposes and says:

1. I am President of HNTB Holdings Ltd, as well as a member of the Board of Directors of HNTB Holdings Ltd, the parent company of HNTB Corporation. I make this Affidavit in Support of HNTB's Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction.

2. HNTB has a legitimate business interest in enforcing the noncompetition provisions of Robert Stromsted's Senior Vice President Agreement.

3. While employed at HNTB Mr. Stromsted was privy to significant confidential business strategies and trade secrets of HNTB.

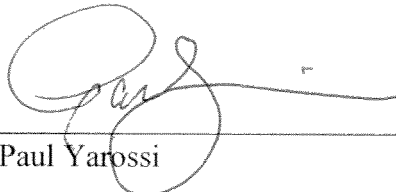
4. The trade secrets included, but are not limited to, HNTB's methodology for business operations relating to construction projects and management of contractors.

5. Mr. Stromsted was also privy to high level confidential business information relating to HNTB's corporate business strategy.

6. While at HNTB Mr. Stromsted developed and enhanced relationships with various significant customers including, but not limited to, the Port Authority of New York, New Jersey SKANSKA, the City of New York, the Metropolitan Transit Authority of the City of New York, the U.S. Corps of Engineers, the City of Dallas, Texas, the Water Resources Board of Sacramento, California, and the Government of Riverside County, California.

7. Mr. Stromsted's employment with a competitor of HNTB could cause significant irreparable injury to HNTB in the form of loss of business of which amount of damages would not be easily calculable.

Further affiant sayeth naught.


Paul Yarossi

Subscribed and sworn to before this 7th day of April, 2011.


Notary Public

My Commission Expires:

2/7/2014

